

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

SHERRY JAMES as Special Administrator
of the Estate of MALCOLM JAMES, deceased,

Plaintiffs,

Case No. 22-CV-344

v.

RACINE COUNTY SHERIFF'S
DEPARTMENT, SHERIFF
CHRISTOPHER SCHMALING,
SGT. JUSTIN BRANDS, SGT ERLINDA
RODRIGUEZ, OFFICER JONATHAN
KOSKI, OFFICER ADRIAN PAYNE,
OFFICER JOSUE DAVALOS-ALONSO
OFFICER MICHAEL SAULYS,
OFFICER CRISTAIN BRINDIS,
OFFICER JUSTIN GAUDES,
MEnD CORRECTIONAL CARE, PLLC, and
CRYSTAL KRISTAINSEN,

Defendants.

NOTICE OF BANKRUPTCY FILING AND IMPOSITION OF AUTOMATIC STAY

PLEASE TAKE NOTICE that on November 30, 2022, MEnD Correctional Care, PLLC (“Debtor”) commenced a voluntary case (the “Chapter 11 Case”) under chapter 11 of title 11 of the United States Code (11 U.S.C. § 101 et. seq.) (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Minnesota (“the Bankruptcy Court”). The Chapter 11 Case is being administered under Case No. 22-60407. A copy of the Debtor’s chapter 11 petition is attached hereto as Exhibit A.

PLEASE BE ADVISED that pursuant to section 362(a) of the Bankruptcy Code, the filing of a bankruptcy petition “operates as a stay, applicable to all entities,” of, among other things “the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been

commenced before the commencement of the case under the Bankruptcy Code, or to recover a claim against the debtor that arose before the commencement of the bankruptcy case" and "any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate." 11 U.S.C § 362(a)(1), (3). Accordingly, the above-captioned matter has been automatically stayed pursuant to section 362(a) of the Bankruptcy Code.

PLEASE BE FURTHER ADVISED that any action taken against the Debtor without obtaining, from the Bankruptcy Court, relief from the Automatic Stay is void ab initio and may result in a finding of contempt for violation of the Automatic Stay. The Debtor reserves and retains its statutory right to seek relief in the Bankruptcy Court from any action by Plaintiffs, Intervening Plaintiffs, Intervening Involuntary Plaintiffs or cross-claiming Defendants, or from any judgment, order, or ruling entered in violation of the Automatic Stay.

In the event the Court or any parties have questions regarding the Chapter 11 Case, please contact counsel for the Debtor:

Steven B. Nosek, P.A.
Attorney at Law
2812 Anthony Lane S, #200
St. Anthony, MN 55418 (612) 335-9171

Dated this 2nd day of December, 2022

OTJEN LAW FIRM, S.C.
Attorneys for Defendants MEnD
Correctional, PLLC and Crystal Kristainsen

s/ Jason J. Franckowiak
Jason J. Franckowiak, SBN 1030873

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